

STATE OF HAWAII  
DEPARTMENT OF EDUCATION  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

11/25/2009

**TO:** Complex Area Superintendents  
Principals (all)

**C:** Assistant Superintendents  
Superintendent's Office Directors  
Charter School Administrative Office  
Deputy Superintendent

**FROM:** Patricia Hamamoto, Superintendent  
Office of the Superintendent

**SUBJECT:** Use of Free Webhosting Sites

Personnel at schools using free webhosting sites such as Google Apps, Google gmail, Microsoft Live@edu, or other sites for student email accounts, shared calendars, or other functions are responsible for maintaining the privacy of student information. To protect the privacy and confidentiality of our students, using these sites to post, share or otherwise use personally identifiable information of any student is strictly prohibited, because these applications store information on servers outside of the Department of Education (Department) network.

Under the Family Educational Rights and Privacy Act (FERPA), § 99.3, personally identifiable information includes, but is not limited to:

- (a) The student's name when used in conjunction with any of the other information described in this list;
- (b) The name of the student's parent or other family members;
- (c) The address of the student or student's family;
- (d) A personal identifier, such as the student's social security number, student number, or biometric record;
- (e) Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;
- (f) Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or

- (g) Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.

The Department has not designated Google as a "school official with a legitimate educational interest" nor granted the organization access to any student records because Google is not under the direct control of the Department through a contract permitting data access and use .

Webhosting services and email correspondence may be used to request meetings or communications with students and their families; however, sensitive student information such as test scores, grades, or program modifications should be omitted. Encrypt and password protect all personally identifiable information provided in any electronic format to students or parents.

All staff at schools using free webhosting services are to be informed of the potential risks of using those services with students and parents as well as receive student information privacy and security trainings to reduce potential errors.

If you have any questions, please contact Christina Tydeman, Data Governance, at 586-3228 or Helen Uyehara, Information Access Support, at 692-7263.

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